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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**MARISA MOON,**

Plaintiff,

v.

**CITY OF PORTLAND**, a municipal corporation, **Portland Police Bureau Officers JOHN DOES 1 through 3**, (the names John Doe being fictitious, as the true names and shield numbers are not presently known), in their individual capacities,

Defendants.

Case No. **3:22-cv-00758-YY**

**JOINT MOTION FOR CONTINUANCE  
OF CASE MANAGEMENT DEADLINES**

**MOTION**

The parties jointly request a third extension of case management deadlines for good cause. This is the third such request. ECF 20; ECF 22.

### MEMORANDUM IN SUPPORT

The parties jointly requested an extension of PTO deadlines in order to accommodate a judicial settlement conference. ECF 22. This JSC was set for October 12, 2023. ECF 21. The conference was cancelled by the court and re-set for November 8, 2023. ECF 24; ECF 26. The case has not settled. Thus, the parties now jointly request the extensions below in order to conduct necessary remaining discovery, including exchanging supplemental discovery requests and taking depositions.

The parties respectfully request extensions of case management deadlines as follows:

- 1.) An extension of the deadline to complete fact discovery from November 30, 2023 to March 15, 2024.
- 2.) An extension of the deadline to amend pleadings, add parties, and join claims to February 16, 2024.
- 3.) An extension of the deadline to file dispositive motions, if any, to May 17, 2024.
- 4.) Deadlines for expert reports, rebuttal reports and expert discovery are to be continued and set after final ruling on dispositive motions.

### CONCLUSION

Therefore, the parties respectfully request the Court issue an order extending case management deadlines, as set forth above.

Dated: November 30, 2023.

Respectfully submitted,

By: /s/Jane L. Moisan  
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